

UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY(CAMDEN)	
RAS Citron, LLC 130 Clinton Road, Suite 202 Fairfield, NJ 07004 Telephone Number 470-321-7112 Attorneys For Secured Creditor U.S. BANK NATIONAL ASSOCIATION, as Trustee for Structured Asset Securities Corporation Mortgage Pass-Through Certificates, Series 2006-W1 Harold Kaplan, Esq. (HK-0226)	CASE NO.: 19-28930-ABA CHAPTER 13 Objection to Confirmation of Debtors' Chapter 13 Plan
In Re: Clifford Carter, Debtor. Regina Carter, <i>fka Regina Collins,</i> <i>fka Regina Spring Carter,</i> Joint Debtor.	

OBJECTION TO CONFIRMATION OF DEBTOR'S CHAPTER 13 PLAN

U.S. Bank National Association, As Trustee For Structured Asset Securities Corporation Mortgage Pass-Through Certificates, Series 2006-W1 ("Secured Creditor"), by and through its undersigned counsel, objects to confirmation of Debtor's Chapter 13 Plan (DE # 51), and states as follows:

1. Debtor, Clifford Carter and Regina Carter, ("Debtor"), filed a voluntary petition pursuant to Chapter 13 of the Bankruptcy Code on October 4, 2019.
2. Secured Creditor holds a security interest in the Debtor's real property located at 504 E Godfrey Ave, Philadelphia, PA 19120, by virtue of a Mortgage recorded on February 03, 2006 in Document ID 52038609 of the Public Records of Philadelphia County, PA. Said Mortgage secures a Note in the amount of \$148,750.00.

3. The Debtor filed a Modified Chapter 13 Plan on May 22, 2020.

4. The Debtor's plan attempts to request Forbearance of the mortgage payments which come due April, May, and June 2020 which is an inappropriate plan provision. The granting of any such request is solely in the discretion of secured creditor and must be made directly to Secured Creditor for consideration. Therefore, Secured Creditor objects to the Modified Plan which inappropriately proposes Forbearance of Mortgage Payments. Therefore, the Plan is not in compliance with the requirements of 11 U.S.C. § 1325(a)(5) and cannot be confirmed. Secured Creditor objects to the Plan and to any plan which does not appropriately provide for the required monthly mortgage payments to be made as they come due.

5 The Plan does not appear feasible due to inadequate treatment of Se-cured Creditor's claim. Thus, the plan violates the provisions of 11 U.S.C. § 1325(a)(3) and cannot be confirmed.

WHEREFORE, Secured Creditor respectfully requests this Court sustain the objections stated herein and deny confirmation of Debtor's Plan, and for such other and further relief as the Court may deem just and proper.

Dated: June 1, 2020

RAS Citron, LLC
Attorney for Secured Creditor
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Fairfield, NJ 07004
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By: /s/Harold Kaplan
Harold Kaplan, Esquire
NJ Bar Number HK-0226
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CERTIFICATION OF SERVICE

1. I, Harold Kaplan, represent U.S. Bank National Association, As Trustee For Structured Asset Securities Corporation Mortgage Pass-Through Certificates, Series 2006-W1 in this matter.
2. On June 1, 2020, I caused a copy of the following pleadings and/or documents to be sent to the parties listed in the chart below.
3. I certify under penalty of perjury that the above documents were sent using the mode of service indicated.

Dated: June 1, 2020

RAS Citron, LLC
Attorney for Secured Creditor
130 Clinton Road, Suite 202
Fairfield, NJ 07004
Telephone Number 470-321-7112

By: /s/Harold Kaplan
Harold Kaplan, Esquire
NJ Bar Number HK-0226
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<u>Name and Address of Party Served</u>	<u>Relationship of Party to the Case</u>	<u>Mode of Service</u>
Mark W. Ford Law Office of Mark W. Ford, LLC PO Box 110 4 1/2 North Broadway Gloucester City, NJ 08030	Attorney for Debtor	<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular mail <input type="checkbox"/> Certified Mail/RR <input type="checkbox"/> E-mail <input checked="" type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other (as authorized by the court*)
Clifford Carter 12 Robin Lane West Berlin, NJ 08091	Mark W Ford Law Office of Mark W. Ford, LLC P.O. Box 110 4 1/2 North Broadway Gloucester City, NJ 08030	Hand-delivered <input checked="" type="checkbox"/> Regular mail <input type="checkbox"/> Certified Mail/RR <input type="checkbox"/> E-mail <input type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other (as authorized by the court*)
Regina Carter fka Regina Collins fka Regina Spring Carter 12 Robin Lane West Berlin, NJ 08091	Joint Debtor	<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular mail <input type="checkbox"/> Certified Mail/RR <input type="checkbox"/> E-mail <input type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other (as authorized by the court*)
Isabel C. Balboa Chapter 13 Standing Trustee Cherry Tree Corporate Center 535 Route 38 - Suite 580 Cherry Hill, NJ 08002	Chapter 13 Trustee	<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular mail <input type="checkbox"/> Certified Mail/RR <input type="checkbox"/> E-mail <input checked="" type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other (as authorized by the court*)
U.S. Trustee US Dept of Justice Office of the US Trustee One Newark Center Ste 2100 Newark, NJ 07102	U.S. Trustee	<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular mail <input type="checkbox"/> Certified Mail/RR <input type="checkbox"/> E-mail <input checked="" type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other (as authorized by the court*)

